

[joe@joethomas.org](mailto:joe@joethomas.org)

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**From:** joe@joethomas.org  
**Sent:** Wednesday, August 8, 2018 9:27 AM  
**To:** 'Jayne L. Freeman'  
**Cc:** 'Derek C. Chen'; 'LaHoma Walker'; 'JULIE'  
**Subject:** RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-MJP

Dear Jayne:

This supplemental discovery sent on August 06, 2018 is simply unacceptable.

First, there is no identifier for me to know what is supplemented and is not supplemented. As Ms. Dalessio's pro bono attorney, it is a waste of my time to determine what you are supplementing. It is your duty in order to inform me what you are supplementing, since these are your responses.

Additionally, attached to the email with the supplemental discovery on August 06, 2018 there is an "Administrative Policy Statement" concerning the release of documents. This document does not appear to be identified in discovery. The document is titled 374474 and that document title does not appear anywhere in the text of the supplemental discovery. It is unclear if this document is produced in response to a particular interrogatory, to a request for production of documents, or if it is just something not requested that you wanted to share. There needs to be context with the documents that you provide.

Please respond at your earliest convenience so that we may continue with discovery as expeditiously as possible.

Very truly yours,

Joe

Joseph Thomas  
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NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying it or disclosing its contents to others. Thank you.

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**From:** LaHoma Walker <LWalker@kbmlawyers.com>  
**Sent:** Monday, August 6, 2018 3:42 PM  
**To:** joe@joethomas.org  
**Cc:** Jayne L. Freeman <JFreeman@kbmlawyers.com>; Derek C. Chen <DChen@kbmlawyers.com>  
**Subject:** Dalessio v. University of WA, Case No. 2:17-cv-00642-MJP

Good afternoon.

Attached please find Defendants' Objections and First Supplemental Responses Thereto Plaintiff's First Set of Discovery Requests and responsive documents, a copy of which has also been sent to you via First Class U.S. mail.

Thank you.

***LaHoma Walker***

Legal Assistant to  
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